

July 29, 2013

**VIA ELECTRONIC FILING**

Jocelyn G. Boyd, Esquire  
Chief Clerk & Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

**Re: Petition of the Office of Regulatory Staff to Establish Dockets to Consider  
Implementing the Requirements of Section 1251 (Net Metering and Additional  
Standards) of the Energy Policy Act of 2005  
Docket No. 2005-385-E**

Dear Ms. Boyd:

I am writing you on behalf of the Electric Cooperatives of South Carolina (ECSC). On July 26 ECSC requested clarification on whether or not intervention was necessary in order to file comments or statements relating to the July 2, 2013 Notice of Workshop. ECSC understands that comments or statements may be due within the next few weeks. Due to the short timeframe involved, ECSC files the following preliminary statement and request.

This docket deals with complex energy issues that will raise challenges affecting the long term direction of distributed generation and perhaps distributed energy storage in South Carolina. In order to properly prepare for a viable solution, the Public Service Commission should consider the following goals:

- An effective solution to advance the deployment of solar and other forms of distributed generation and distributed storage in South Carolina;
- Measure customer interest and determine how to insulate the customer/member from incurring cost increases which are in effect a subsidy of the cost of system reliability of those customers/members that choose to utilize distributed generation and/or distributed storage.

The Public Utility Review Committee (PURC), Energy Advisory Committee, is currently considering, at PURC's request, very specific questions that address these important issues and the broader question of distributed generation and storage (see PURC, Advisory Committee Member List; EAC Research Questions). PURC has asked the Energy Advisory Committee for feedback prior to December 31, 2013. While it is up to the General Assembly

July 29, 2013

Page 2

to consider whether legislation should grow out of the report, ECSC believes legislation is necessary to address the broader question of how distributed generation/storage impacts our current regulatory methodology. To that extent, ECSC respectfully requests that the commission consider that the question is much broader than net metering as originally set forth in the 2005 docket. Technological advancement is pressing public policy to follow. ECSC believes that we are entering a period of dynamic change which will require close coordination between stake holders, the General Assembly, and Regulators.

For that reason, ECSC requests that the workshop be deferred until PURC accepts the Energy Advisory Report or in the alternative that the workshop is limited to informational purposes only.

Thank you for your attention to this matter.

With kind regards, I remain

Very truly yours,



J. David Black

JDB/hjr

cc: J. Blanding Holman, IV, Esquire (via e-mail)  
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